

1 LIPSON NEILSON P.C.  
2 JOSEPH P. GARIN, ESQ.  
3 Nevada Bar No. 6653  
4 9900 Covington Cross Drive, Suite 120  
5 Las Vegas, Nevada 89144  
(702) 382-1500 - Telephone  
(702) 382-1512 - Facsimile  
[jgarin@lipsonneilson.com](mailto:jgarin@lipsonneilson.com)

5 *Attorneys for Melanie Hill and Hardeep Sull,*  
6 *Plaintiff's Counsel*

7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

9 SANDAR M. MESA-PEREZ, an individual,

10 Plaintiff,

11 v.

12 SBARRO LLC dba SBARRO PIZZA, a foreign  
13 limited liability company; SBARRO, INC. dba  
14 SBARRO PIZZA, a foreign corporation;  
15 ZACHARY CEBALLES, and individual;  
16 EFRAIN HERNANDEZ, an individual; JESUS  
17 ALATORRE, an individual; DANA DORADO,  
18 an individual,

Defendants.

CASE NO. 2:19-cv-373-APG-NJK

**STIPULATION AND (PROPOSED)  
ORDER TO EXTEND TIME TO FILE  
OPPOSITION TO DANA DORADO'S  
MOTION FOR ATTORNEY'S FEES AND  
COSTS PURSUANT TO THE COURT'S  
ORDER GRANTING RULE 11  
SANCTIONS AGAINST PLAINTIFF'S  
COUNSEL (DOCKET NO. 180)**

19 The parties herein, by and through their attorneys of record, hereby stipulate and  
20 agree to the following:

21 1. On September 30, 2020, the Court filed an Order (1) Granting Motion for  
22 Sanctions Under Rule 11 and (2) Denying Motion for Sanctions Under 28 U.S.C. §1927  
23 and the Court's Inherent Powers [Doc 177].

24 2. In the Order, the Court directed that "the parties must confer about the  
25 amount of those fees and costs by October 28, 2020. See Order p. 6:17-18.

26 3. By November 13, 2020, if the parties were not in agreement, Dorado may  
27 file a motion "with supporting affidavits and appropriate documentation requesting  
28 reasonable attorneys' fees and costs." See Order p. 6:19-21.

1       4. On November 6, 2020, the parties filed a Stipulation and Order to Extend  
2 Time to permit Dorado until November 30, 2020 to file Motion for Attorney's Fees and  
3 Costs. [Doc 178].

4       5. On November 9, 2020, the Court granted the Stipulation and Order to  
5 Extend Time to permit Dorado until November 30, 2020 to file a Motion for Attorney's  
6 Fees and Costs [Doc 179].

7       6. On November 30, 2020, Dorado filed a Motion for Attorney's Fees and  
8 Costs Pursuant to the Court's Order Granting Rule 11 Sanctions Against Plaintiff's  
9 Counsel [Doc 180].

10      7. Opposition to Dorado's Motion is currently due on December 28, 2020.

11      8. Parties agree and stipulate that Plaintiff's Counsel shall have up to and  
12 including **January 4, 2021** to file its Opposition to Dorado's Motion.

13      9. This stipulation is submitted based upon good cause, and is not made for  
14 the purpose of delay.

15      Dated this 17<sup>th</sup> day of December, 2020

16      Dated 17<sup>th</sup> day of December, 2020

17      GREENBERG TRAURIG, LLP

18      LIPSON NEILSON P.C.

19      /s/ Jason K. Hicks

20      /s/ Joseph P. Garin

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Mark E. Ferrario, Esq.  
22      Jason K. Hicks, Esq.  
23      10845 Griffith Peak Drive, Suite 600  
24      Las Vegas, Nevada 89135  
25      *Attorneys for Defendant Dana Dorado*

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Joseph P. Garin, Esq.  
27      9900 Covington Cross Drive, Suite 120  
28      Las Vegas, Nevada 89144  
29      *Attorneys for Melanie Hill  
and Hardeep Sull,  
Plaintiff's Counsel*

22      **ORDER**

23      IT IS SO ORDERED.

24      Dated: December 18, 2020

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27      UNITED STATES DISTRICT COURT JUDGE  
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